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16 August 1998

Commission's Secretary, Magalie Roman Salas
Office of the Secretary, Federal Communications Commission
1919 M Street NW, Room 222
Washington, DC 20554

RE: FCC docket number 98 143.

FCC: In this Notice, we propose to modify our Amateur Radio Service rules as follows:

FCC: 01. Reduce the number of license classes from 6 to 4.

I totally agree. Novice, Tech & Tech+ should be combined and called Tech. All other Classes, i.e., General, Advanced & Extra should remain the same as they are at present. There is also NO practical need to rename Extra to Class "A", Advanced to Class "B", General to Class "C" or Tech to Class "D", as was earlier proposed.

FCC: 02. Provide greater opportunities to volunteer examiners (VE's) to participate in the examination process.

I agree.

FCC: 03. Eliminate Radio Amateur Civil Emergency Service (RACES) licenses because the emergency communications that routinely are transmitted by RACES stations can be transmitted by primary, club or military recreation stations.

I agree.

FCC: 04. We seek comment on ideas for improving our enforcement processes as they relate to amateur radio.

I agree. All that can be done to process unfavorable or unlawful actions on the amateur bands must be done to maintain order, dignity and discipline.

FCC :05. We also seek comment on changes to the telegraphy requirements for the amateur radio service and to the written examinations that must be passed to qualify for an amateur radio license.

(Continued)

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In relation to the telegraphy exams, I favor small changes in the CW requirements as follows:

(A) The new class of Tech should be 5 wpm for those who wish to have access to the Novice and Tech+ portions of the HF bands that now exist for these existing classes. Those that do not pass the CW exam should still be **limited to the VHF/UHF** portions of the band now allocated to the Tech class license. This need **NOT** be a separate class of license as now exists (*plain Tech Class*), only an **"endorsement"** on the Tech license **IF** the 5 wpm testing has been passed. *[The FAA did this on the Commercial Pilot license without any problems. "IF" a pilot had a Commercial license WITH an instrument rating, the pilot was issued a license with a "blue FAA seal" to signify the instrument rating. The Commercial pilots WITHOUT the instrument rating still held the Commercial pilots license BUT, without the instrument certification seal.]*

(B) General Class down to 10 wpm, (C) Advanced Class up to 15 wpm and (D) Extra Class to remain at 20 wpm. Nice 5 wpm steps, simple but yet "structured"!

NOW TO MAKE A POINT! The CW mode is definitely **"NOT NEEDED"** for communication purposes in this day and time! There are MANY modes of communication, other than CW, available to the amateur today. However, the CW does inject the **"NEEDED"** discipline into the Amateur Radio Service that separates it from the Citizens Band Radio Service. There is NO discipline, dignity OR formalization in CB! The Amateur Radio Service **DOES NOT NEED** to become the **undisciplined, undignified and unformalized** hobby that is so prevalent in "CB"!

We need CW to maintain the **"highest standards"** which were established by our pioneers and to which we have become accustomed to, for many years. There is no **"need"** to drastically change these standards, as it helps to **discipline, dignify and formalize** this great service and hobby.

There are ENTIRELY too many code "waivers" issued. The system is VERY flawed as it exists. The "must try" waiver rule is a "no-brainer". The candidate ONLY has to go to the exam room, listen to the test and then all he/she has to say is, "I CAN'T DO IT" and he/she is issued a waiver. NONSENSE! There are thousands of persons holding 20 wpm privileges, with VERY SEVERE handicaps, that did not "Cry for a waiver"!

In relation to the written exams - As an ex-VE (*by resignation*), in my opinion, there are NOT enough questions on the exams. This does not change the percentage needed to pass, only to "force" the candidate to actually "study" in lieu of memorizing the exam questions. The number of exam questions should be, AT THE VERY LEAST, doubled. The exam pool questions and answers are readily available, and there is no reason not to double the questions.

FCC: 06. Finally, we dispose of various routine and repetitive petitions for rule making which concern matters on which the Commission already has acted.

I agree.

Respectfully Submitted,



William D. Price W4CZ

Life Member:
The American Radio Relay League (ARRL)
Radio Amateur Satellite Corporation (AMSAT)
Quarter Century Wireless Association (QCWA)